

IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA

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JESSIE P. HACKETT, CLERK
U.S. DISTRICT COURT
MIDDLE DISTRICT ALA.CIVIL ACTION NO. 2:06 CV 1082-MHT
(To be supplied by Clerk of
U.S. District Court)Antonie Washington # 1975-22
Full name and prison number
of plaintiff(s)v. Brian Mitchell, psychologist
(Comm.)Bob Riley, Governor; Richard AllenLawendolyn Meseley, warden, Paul WhaleyDirector of Classification, Mrs. Brown, Century
Sandra Hayes Classification specialistRecords: Latrice Greene, Director of Classification
Easterling Charlotte Wilson, Classification specialist Sidney
Williams, Chairman; William C. Sequest, Director parole BenName of person(s) who violated
your constitutional rights.
(List the names of all the
persons.)

DEMAND FOR JURY TRIAL

I. PREVIOUS LAWSUITS

- A. Have you begun other lawsuits in state or federal court dealing with the same or similar facts involved in this action? YES () NO (☒)
- B. Have you begun other lawsuits in state or federal court relating to your imprisonment? YES () NO (☒)
- C. If your answer to A or B is yes, describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline.)

1. Parties to this previous lawsuit:

Plaintiff(s) N/ADefendant(s) N/A2. Court (if federal court, name the district; if
state court, name the county) N/A

3. Docket number N/A
4. Name of judge to whom case was assigned N/A
5. Disposition (for example: Was the case dismissed? Was it appealed? Is it still pending?) N/A
6. Approximate date of filing lawsuit N/A
7. Approximate date of disposition N/A

II. PLACE OF PRESENT CONFINEMENT Easterling Corr. Fac. 200 Wallace Drive, Clib Alabama 36017

PLACE OF INSTITUTION WHERE INCIDENT OCCURRED Alabama State Capitol, Central Records of A.L.D.O.C., Alabama Parole Board central office.

III. NAME AND ADDRESS OF INDIVIDUAL(S) YOU ALLEGE VIOLATED YOUR CONSTITUTIONAL RIGHTS.

NAME

ADDRESS

1. Bob Riley, State Capitol, 600 Dexter Avenue, Room N-103, Montgomery, AL 36130
Brian Mitchell, 200 Wallace Drive, Clib, AL 36017
2. Richard Allen ALDOC, 64 N-union street, Montgomery, AL 36130
Lwendolyn Moseley, 200 Wallace Drive, Clib, AL 36017
3. Latrice Greene 200 Wallace Drive, Clib, AL 36017
Sidney Williams, central office, 301 S. Ripley street, Montgomery, AL 36130-2405
4. Charlette Wilson 200 Wallace Drive, Clib, AL 36017
Paul Whaley 1400 Lloyd Street, Montgomery, AL 36130
5. MS Brown 1400 Lloyd Street, Montgomery, AL 36130
Sidney Williams, central office, 301 S. Ripley street, Montgomery, AL 36130-2405
6. William C. Sagrest, central office, 301 S. Ripley, street, Montgomery, AL 36130-2405
Sandra Hayes 200 Wallace Drive Clib AL 36017

IV. THE DATE UPON WHICH SAID VIOLATION OCCURRED ON OR ABOUT May 2, 06
and ~~November~~ December 15th, 2006 continuously.

V. STATE BRIEFLY THE GROUNDS ON WHICH YOU BASE YOUR ALLEGATION THAT YOUR CONSTITUTIONAL RIGHTS ARE BEING VIOLATED:

GROUND ONE: Defendants herein acted in concert to make plaintiff the victim of overcrowdedness, lack of security, Health Hazard situation and misappropriate use of ~~gov~~ Government Funds for pre-seg, Crime Bill and Aftercare at Easterling Corr. Fac. For ALDOC in violation of plaintiff Eighth and fourteenth Amendment of the United States Const.

STATE BRIEFLY THE FACTS WHICH SUPPORT THIS GROUND. (State as best you can the time, place and manner and person involved.)

Defendants; Riley, Allen, moseley, mitchell, whealey, Brown, Lorean, wilson,
Hayes Force Plaintiff to take Counter productive programs of
Pre-sap-Crime Bill and After care in order to recieve Government funding
even though this is a repeat of the same criteria in the same dorms 9and 10
at Eastefling Corr. Fac. which is over crowded, rat and insect infested with foul tasting
greasy firm drinking water. Bunks are often packed together so closely that sanitation
is impossible to maintain. Defendants continue to bring more inmates from County jails, and refuse
to follow 3:00 p.m. for ALDOC in order to not plaintiff to request programs for funds
and security again.

GROUND TWO: Defendants williams and segrest acts in concert with other

Defendants Riley, et al. to deliberate indifference plaintiff from other inmates granted
parole because of their elite status and funds.

SUPPORTING FACTS: Defendants williams and segrest grants parole to other inmates

who have concern Family members with funds and lawyers to represent them at their
parole hearings plus under the table tips and contribution to parole board members.

Plaintiff contend that he was denied this same opportunity of equality because

he had no family members, lawyers, or funds to contribute to parole board members; was

left in the system to redundancy through these ALDOC Counter productive programs for more
funds from the Government for Defendants were in to split.

GROUND THREE: _____

SUPPORTING FACTS: _____

VI. STATE BRIEFLY EXACTLY WHAT YOU WANT THE COURT TO DO FOR YOU.
MAKE NO LEGAL ARGUMENT. CITE NO CASES OR STATUTES.

Plaintiff ~~are~~ ^{seek} jury trial, injunctive relief for defendants to fix overcrowding, stop
Racketeering the Federal government for funds by deceptive means under the disguise of treatment
To grant Plaintiff and other inmates parole equally ending this deliberate indifference
and stop punitive treatment of plaintiff. For punitive treatment of plaintiff in this overcrowded
lack of security Health Hazard situation plaintiff seek Five (5) million dollars in punitive
damages and Attorney fees

Antone Washington
Signature of plaintiff(s)

I declare under penalty of perjury that the foregoing is true
and correct.

EXECUTED on _____
(Date)

Antone Washington
Signature of plaintiff(s)